

FACT SHEET for FABRICATORS of FINISHED GOODS

REDUCING FORMALDEHYDE EMISSIONS FROM

Composite Wood Products

Airborne Toxic Control Regulation Requirements



What are composite wood products?

“Composite wood products” are panels made from pieces, chips, particles, or fibers of wood bonded together with a resin. The California Composite Wood Products Regulation specifically focuses on three products: hardwood plywood with a veneer core or composite core (HWPW), particleboard (PB), and medium density fiberboard (MDF). The regulation requires finished goods made with HWPW, PB, and MDF that comply with the regulatory requirements and to be labeled as such. Composite wood is found in many different types of finished goods such as cabinets, doors, furniture, flooring products, moldings, toys, mirror and photo frames, audio speakers, base boards, shelving, and countertops.

Who is subject to the Composite Wood Products Regulation?

The regulation applies to panel manufacturers, distributors, importers, fabricators, retailers, and third party certifiers of HWPW, PB, MDF. It also applies to retailers and fabricators of finished goods containing those products that are sold or supplied to businesses and consumers in California. This fact sheet discusses the requirements for fabricators.

What is a fabricator?

A “fabricator” is anyone that uses composite wood products to make finished goods. Examples of fabricators include individuals and/or companies that use composite wood panels to produce furniture, cabinets, doors, etc.

What does the Composite Wood Products Regulation require?

The regulation establishes emission limits and labeling requirements for composite wood products. It also requires fabricators to take reasonable prudent precautions to ensure the products they make comply with the emission limits and to keep records.

What are the emission standards?

As shown in the tables below, the regulation establishes two phases of formaldehyde emission standards, for HWPW with a veneer core (HWPW-VC) and with a composite core (HWPW-CC), PB, MDF, and thin MDF (≤ 8 mm thick). Finished goods must be made with composite wood products that meet these standards. The standards apply to both domestic and imported products.

PHASE 1 FORMALDEHYDE EMISSION STANDARDS (parts per million)*

EFFECTIVE DATE	HWPW-VC	HWPW-CC	PB	MDF	tMDF
JANUARY 2009	0.08	----	0.18	0.21	0.21
JULY 2009	----	0.08	----	----	----

*based on ASTM 133-96 (2002)

PHASE 2 FORMALDEHYDE EMISSION STANDARDS (parts per million)*

EFFECTIVE DATE	HWPW-VC	HWPW-CC	PB	MDF	tMDF
JANUARY 2010	0.05	----	----	----	----
JANUARY 2011	----	----	0.09	0.11	----
JANUARY 2012	----	----	----	----	0.13
JULY 2012	----	0.05	----	----	----

*based on ASTM 133-96 (2002)

What are the labeling requirements for fabricators?

Fabricators must label all finished goods produced for the California market to indicate they are made with complying products. The label shall be applied as a stamp, tag, sticker, or bar code on every finished good produced, or on every box containing finished goods. The minimum label requirements are: the fabricator's name, production date, and markings that the product was made with HWPW, PB, and MDF that complies with applicable emission

standards. Finished goods should be labeled as having been made with no-added formaldehyde based resins (NAF) or ultra-low emitting formaldehyde based resins (ULEF) if this is so for all of the HWPW, PB, and MDF used in fabricating the finished good. Fabricators must also include a statement of compliance on bills of lading or invoices, which serves as a record of the sale of compliant products for downstream customers.

What is meant by “reasonable prudent precaution”?

Reasonable prudent precaution means that a fabricator takes steps to ensure that the composite wood products used in finished goods that they make are in compliance with the applicable emission standards such as using only compliant products, requesting written verification of compliance from suppliers, and requiring copies of formaldehyde test results from third party certifiers.

What are the recordkeeping requirements for fabricators?

Fabricators producing goods for the California market must keep records showing the dates of purchase and suppliers of composite wood products that they used, and to whom they sold their finished goods. These records must be kept in either electronic or hard copy form for a minimum of two years.

Are fabricators subject to facility inspections?

Yes. All fabricators are subject to inspection by ARB inspectors or local district personnel. During inspections, ARB or local air district personnel may audit records and secure samples for compliance testing.

What exemptions apply under the Composite Wood Products Regulation?

The regulation does not apply to finished goods sold outside of California or to products subject to federal requirements governing the construction of manufactured homes. The regulation also provides exemptions for certain types of window and door assemblies.

What if I have existing inventories produced prior to the effective dates for the emission standards?

Sell-through periods have been included to allow for a reasonable clearing of inventories following the effective dates of the Phase 1 and Phase 2 standards. Fabricators can no longer sell or supply unlabeled finished goods that contain composite wood products that were manufactured prior to January 1, 2009 (pre-Phase 1 finished goods). Fabricators can sell and supply finished goods containing Phase 1 HWPW-VC, PB, and MDF through December 31, 2012; can sell and supply finished goods containing Phase 1 thin MDF until June 30, 2013 and finished goods containing Phase 1 HWPW-CC until December 31, 2013.

Are fabricators required to emission test their finished goods?

No. Fabricators are not required to test the finished goods they produce.

What are fabricator requirements for laminated products?

A laminated product is a finished good or component part of a finished good made by a fabricator in which a laminate or laminates are affixed to a platform. The platform can be either a composite wood product or a core material used in the manufacture of hardwood plywood. If the platform consists of a composite wood product, then it must comply with the applicable emission standards, and be third party certified.

FOR MORE INFORMATION

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